

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIOID  
LITIGATION

MDL No. 2804

*This Document Relates to:*

CASE NO: 1:17-md-2804

*All Cases Noted on the Attached Ex. A*

JUDGE DAN AARON POLSTER

**STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE  
OF THE JANSSEN DEFENDANTS**

The undersigned, as appointed Liaison Counsel between the Texas State Opioid MDL and this Court, submit the following. In accordance with the terms of the settlement agreements entered into between the Plaintiff Political Subdivisions identified in the attached Exhibit A (collectively “the Dismissing Plaintiffs”) and Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. and Noramco, Inc. (collectively the “Janssen Defendants”), the Dismissing Plaintiffs and the Janssen Defendants hereby stipulate to the dismissal of the Dismissing Plaintiffs’ claims with prejudice against the Janssen Defendants only.

Date: May 10, 2022

Respectfully submitted,

/s/ Jeffrey B. Simon

Jeffrey B. Simon

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*On behalf of the Court-Appointed Plaintiffs’ Steering  
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*On Behalf of Defendants Johnson & Johnson,  
Janssen Pharmaceuticals, Inc., Ortho-McNeil-  
Janssen Pharmaceuticals, Inc. n/k/a Janssen  
Pharmaceuticals, Inc., and Janssen Pharmaceutica,  
Inc. n/k/a Janssen Pharmaceuticals, Inc.*

SO ORDERED this \_\_\_\_ Day of \_\_\_\_, 2022.

\_\_\_\_\_  
The Hon. Dan Aaron Polster  
U.S. District Court Judge  
Northern District of Ohio

**CERTIFICATE OF SERVICE**

I hereby certify that on May 10, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF System.

/s/Jeffrey B. Simon  
Jeffrey B. Simon